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UNITED STATES  
DEPARTMENT OF THE INTERIOR  
FISH AND WILDLIFE SERVICE  
Suite 322  
315 South Allen Street  
State College, Pennsylvania 16801

April 8, 1985

Mr. Robert Ogg, Chief  
Site Investigation and Compliance  
Branch  
Environmental Protection Agency  
26 Federal Plaza  
New York, New York 10278

Dear Mr. Ogg:

Mr. Katz' February 12 letter requested our review and comment on the remedial investigation/feasibility study (RI/FS) work plan for the Asbestos Dump Site, Morris County, New Jersey, with particular emphasis on the secondary site at the Great Swamp National Wildlife Refuge (GSNWR). Mr. Robin Burr of my staff provided preliminary comments to Mr. Nigel Robinson on February 22.

Since this is the first time our respective agencies have worked together on a RI/FS project, I request the opportunity to review and comment on certain reports, plans or actions before they are finalized and implemented. We may, depending on the circumstances, request additional work be conducted, particularly increased sampling and analysis. Requests for increased sampling, as well as our review and comment on all phases of development of a remedial plan will be directed toward protection of the Department's trustee resources.

Our specific recommended changes or additions to the RI/FS work plan are enclosed.

Thank you for the opportunity to provide these comments. If there are questions, please contact Mr. Robin Burr in Absecon, NJ (FTS 483-4313). We look forward to working with you to finalize and implement this work plan for the protection of the Great Swamp National Wildlife Refuge.

Sincerely,

Charles O. Kulp  
Field Supervisor

Enclosure

ASB 002 0622

**Asbestos Dump  
Great Swamp National Wildlife Refuge**

Page 2-7 Great Swamp Site - The report should note that the U.S. Fish and Wildlife Service has site ownership, and that parts of the asbestos area are in a National Wilderness Area for which there are restrictions relative to entry and to the type and extent of work allowed. We have requested guidance on this matter and will keep you advised of our findings.

Page 2-8 Pine Valley Tree Service and White Bridge Road Sites - When the extent and nature of contamination at these sites is better known, we request that EPA inform the Service of contamination on Service lands.

Page 2-15 General Water Quality Standards - The Service requests the opportunity to review and comment upon the standards and resultant criteria before the criteria are finalized.

Page 2-22 Public Health Concerns - We request that EPA conduct a review of current literature to determine if new evidence or data exists to evaluate effects of asbestos on aquatic or mammalian life.

Pages 2-26 to 2-28 Proposed Response - We request that EPA advise the Service if the public should be excluded from the Great Swamp site. We also want to review and comment on any Initial Remedial Measures proposed for areas on or affecting Service lands.

The following comments, which reference pages with the letter A, are for Appendix I, which was sent as a substitute for Section 3 of the RI/FS work plan.

Page A-2 TASK 2 - We request EPA's advice on measures the Service should take at the Great Swamp site to protect the public. Also, are the Pine Valley Tree Service and White Bridge Road Sites on or affecting Service lands, and what should be done with them?

Page A-4 TASK 5 - Provide the Service with a copy of EPA's approved health and safety plan.

Page A-5 TASK 6 - We would appreciate a copy of the Quality Assurance Project Plan for review and comment. The procedures for environmental sampling are of particular interest.

Page A-6 TASK 7 - We would appreciate a copy of the Site Operations Plan for review and comment. The plans for operations on or affecting Service lands, must be approved by the Service prior to implementation.

Page A-7 TASK 8 - If the subsurface investigation at the Pine Valley Tree Service and White Bridge Road Sites show more contamination than previously suspected, their investigation should be expanded at EPA's discretion after consultation with the Service.

Page A-14 TASK 8 Great Swamp Site - We understand that individual boring locations may be altered on the basis of field observations at the discretion of the site geologists with concurrence of the Service. The locations of wells and soil borings are subject to EPA and Service approval.

Page A-15 TASK 8 White Bridge Road and Pine Valley Tree Service Sites - If the initial subsurface investigation indicates a more serious problem than anticipated, we request that EPA consult with the Service prior to expanding the geologic/hydrogeologic investigations because of possible adverse affects to the refuge.

Page A-15 TASK 8 Aquifer Interpretation - EPA should provide the Service with copies of the water-table contour maps and flow nets.

Page A-17 TASK 8 Engineering Investigation Pine Valley Tree Service and White Bridge Road Sites - If it becomes evident that engineering investigations are warranted at these sites, we request that site operation plans be submitted to the Service for review and comment.

Page A-19 TASK 9 - The Service must review and approve the location and design of permanent benchmarks installed on Service lands.

Page A-21 TASK 10 - The unnamed tributary to Black Brook is Middle Brook which should also be noted in Fig. 4 on page A-23. The site referred to as New Vernon Road Site is probably the same area designated Pine Valley Tree Service Site, and if so, the use of the designated New Vernon Road Site should be dropped to avoid confusion. This term is also used on page A-24.

Page A-23 Fig. 4 - Our recommended revision to Fig. 4 is attached. We request that three of the surface water samples include surface water and sediment samples. These changes are recommended to better identify the location of detected contaminants and to improve subsequent mass balance analysis of contaminants.

Page A-25 TASK 10 Surface and Groundwater Monitoring - Besides the proposed two subsequent sampling tours, we recommend scheduling an additional tour during periods of high water and runoff, so as to increase chances of catching potential pulse inputs of contaminants.

Pages A-26 and 27 TASK 11 - We request the opportunity for a Service biologist to accompany the FIT on any survey of the receiving streams. We also ask that, if practicable, sweep netting be conducted in all areas where benthic or stream bottom samples are taken. We request that benthic samples be analyzed for priority pollutants and asbestos fiber count. We understand that Ms. Rosemary Gatters is doing graduate research on macrobenthics in the streams of the Great Swamp National Wildlife Refuge. You may want to contact her for information, if so, her major professor is Dr. Francesco Trama at Rutgers University, New Brunswick (201-932-2810).

We request that EPA increase the diversity of environmental sampling. The proposed sampling of water sediment and soils is not adequate for FWS to determine whether or not trustee resources have been affected by contaminants from all the sites which constitute the Asbestos Dump. Our recommendation for additional environmental sampling is as follows:

1. Fish - collect bottom feeding and predator species at the surface water and sediment sampling locations.
2. Crayfish - collect in same areas as the fish samples.
3. Turtles - collect in same areas as the fish samples.
4. Mammals - attempt to collect small mammals on the uplands of the study sites and on control or uncontaminated sites in the study area. Species of preference are shrews (Sorex), mice (Peromyscus) and house mouse (Mus musculus).
5. Earthworms - collect in the same upland areas as the small mammals.

These additional samples should be analyzed for priority pollutants and fiber count.

Page A-28 TASK 12 - We would appreciate a copy of the RI report.

Pages A-28 and 29 TASK 13 Establish Objectives and Criteria - The Service requests the opportunity to define the objectives used to identify preliminary remedial technologies and comment on criteria to be used to evaluate the alternative remedial technologies.

Pages A-29 and 30 TASK 13 Identify Remedial Techniques - The Service requests the opportunity to review and comment on the final list of remedial measures and must approve final remedial measures planned for areas on or affecting Service lands.

Page A-36 TASK 15 - The Service requests the opportunity to review and comment on the revised FS Work Plan and must approve the Plan's sections for areas on or affecting Service lands.

Page A-37 TASK 16 - Regarding the list of preliminary objectives established for identification and development of remedial measures, the Service recommends that "fish and wildlife resources protection" be added as an objective, at least for areas on or affecting Service lands.

Page A-38 TASK 17 - We request the opportunity to screen remedial alternatives.

Page A-43 TASK 19 Preliminary Report - We would appreciate a copy of the preliminary and final FS reports for review and comment.

Pages 4-1 to 4-3 Project Organization - The Service recommends that its function and participation in completing the Asbestos Dump Site RI/FS be listed. With regard to project organization, we recommend that our point of contact be through the EPA Regional Site Project Officer.

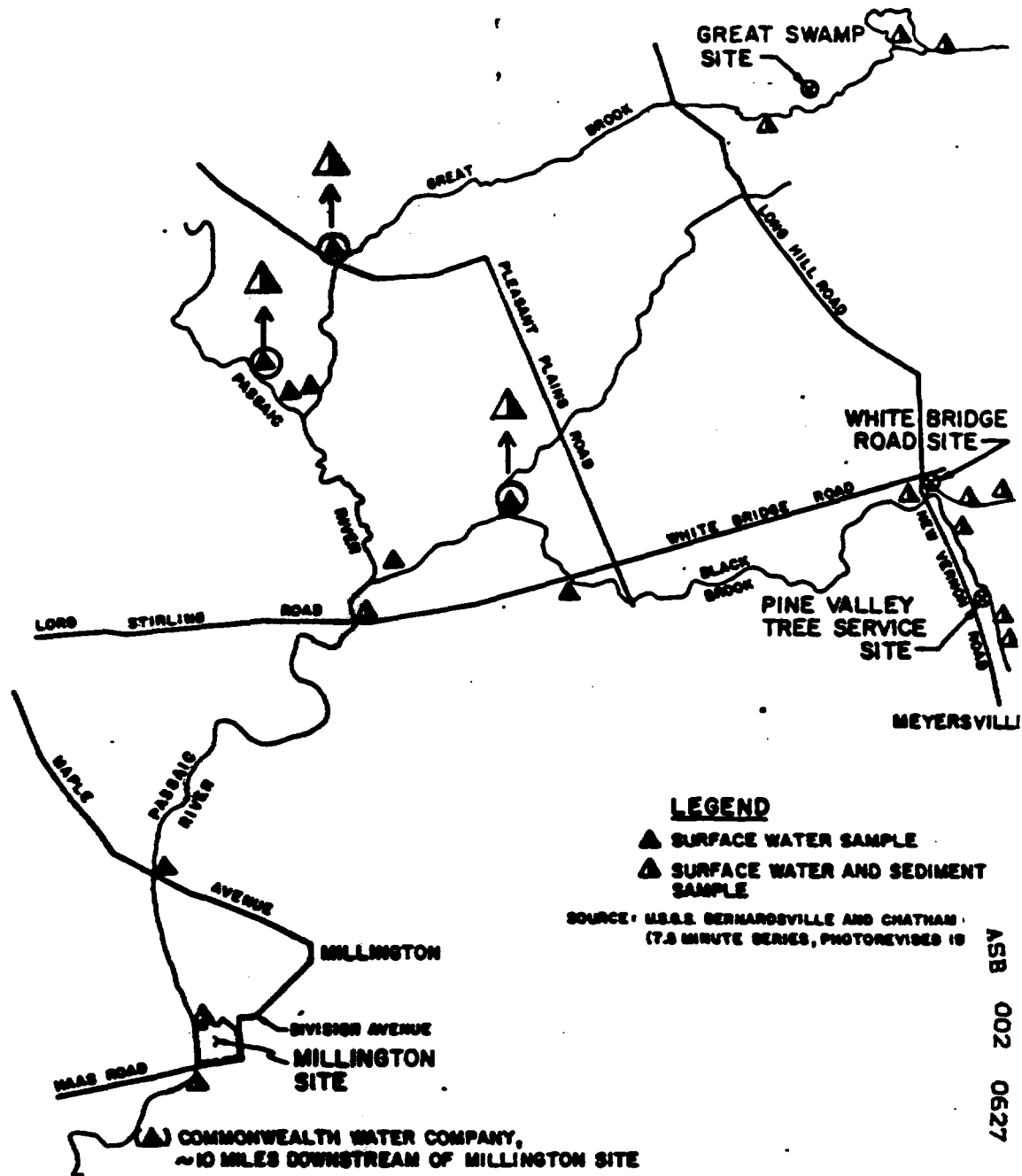
Pages 4-4 and 4-5- REMPO/FITO/EPA Coordination - Include the Service in all the activities requiring EPA's review, comment or approval.

Pages 4-5 and 4-6 Overall Project Management - The Service requests the opportunity to be a member of EPA's Work Group performing regional oversight.

Page 4-9 Status, Interim, Draft and Final Reports and Meeting - The Service requests a copy of the Technical Progress Report, to review and comment on interim, draft and final reports, and to participate in meetings between REMPO and FITO to monitor the progress of RI activities.

Pages 5-1- to 5-4 Project Schedule - The Service advises that areas within or near Great Swamp may not be accessible during certain periods of the year, usually spring, due to flooding.

Figure 4



**PROPOSED SURFACE WATER/  
SEDIMENT SAMPLE LOCATIONS  
ASBESTOS DUMP SITE, MILLINGTON, NJ**  
SCALE 1" = 6,000'

**FIGURE 4**